

EXHIBIT D



FinCEN

 2 of 12
 Financial Crimes Enforcement Network
 United States Department of the Treasury

 BSAR Transcript
 BSA: 31000259112891 and DCN:

BSA:31000259112891

Filing Information	
Type of Report	Initial Report
Filing Date	11/27/2023
Received Date	11/27/2023
Entry Date	11/28/2023
Submission Method	Electronic batch filing

Subject Information		
Subject 1 of 3 : *PSYCHE HEALING AND BRIDGING, LLC		
Role	Subject	
Individual/Organization	Organization	
Last(or Entity) Name	*PSYCHE HEALING AND BRIDGING, LLC	
EIN	932377864	
Form(s) of Identification	Identification Type	Other
	Identification Number	134873940160
	Other Text	SOS
	Issuing State Code	UT
	Issuing State	Utah
	Issuing Country Code	US
Address(es)	Address Type	Subject permanent/mailling address
	Street Address	1969 N STATE STREET
		1969 N STATE ST - Enhanced
	City	PROVO
		PROVO - Enhanced
	State	UT
		UT - Enhanced
	ZIP Code	84604
		84604-1012 - Enhanced
	Country	US
		US - Enhanced
NAICS Code	6213	
NAICS Code Text	Offices of Other Health Practitioners	
Email(s)	BRIDGERJENSEN@GMAIL.COM	
Occupation/Type of Business	Health practice	
Corroborative Statement to Filer	No	
Relationship to Reporting Institution(s)	Institution TIN	340797057
	Relationship of Subject	Customer: Yes



FinCEN

Financial Crimes Enforcement Network
United States Department of the Treasury

3 of 12

BSAR Transcript
BSA: 31000259112891 and DCN:

BSA:31000259112891

Subject Information		
Affected Account(s)	Account Number	44075100 [REDACTED]
	Financial Institution TIN	340797057
Subject 2 of 3 : *SINGULARISM		
Role	Subject	
Individual/Organization	Organization	
Last(or Entity) Name	*SINGULARISM	
EIN	920835772	
Form(s) of Identification	Identification Type	Other
	Identification Number	130076110140
	Other Text	SOS
	Issuing State Code	UT
	Issuing State	Utah
	Issuing Country Code	US
Address(es)	Address Type	Subject permanent/mailling address
	Street Address	1899 S 1030 W
		1899 S 1030 W - Enhanced
	City	OREM
		OREM - Enhanced
	State	UT
		UT - Enhanced
	ZIP Code	84058-8141
		84058-8141 - Enhanced
	Country	US
US - Enhanced		
NAICS Code	8133	
NAICS Code Text	Social Advocacy Organizations	
Email(s)	BRIDGERJENSEN@GMAIL.COM	
Occupation/Type of Business	Religious/therapeutic services	
Corroborative Statement to Filer	No	
Relationship to Reporting Institution(s)	Institution TIN	340797057
	Relationship of Subject	Customer: Yes
Affected Account(s)	Account Number	44075100 [REDACTED]
	Financial Institution TIN	340797057
Subject 3 of 3 : JENSEN		
Role	Subject	
Individual/Organization	Individual	



FinCEN

Financial Crimes Enforcement Network
United States Department of the Treasury

4 of 12

BSAR Transcript
BSA: 31000259112891 and DCN:

BSA:31000259112891

Subject Information		
Last(or Entity) Name	JENSEN	
First Name	BRIDGER	
Middle Name	L	
Gender Type	Male	
Date of Birth	09/06/1981	
SSN/ITIN	[REDACTED]	
Form(s) of Identification	Identification Type	Driver's license/State ID
	Identification Number	[REDACTED]
	Issuing State Code	UT
	Issuing State	Utah
	Issuing Country Code	US
Address(es)	Address Type	Subject permanent/mailling address
	Street Address	[REDACTED]
		[REDACTED] - Enhanced
	City	OREM
		OREM - Enhanced
	State	UT
		UT - Enhanced
	ZIP Code	84058-8141
		84058-8141 - Enhanced
	Country	US
		US - Enhanced
Phone Number(s)	Type	Mobile
	Number	[REDACTED]-0102
Email(s)	BRIDGERJENSEN@GMAIL.COM	
Occupation/Type of Business	Therapist\Life Coach	
Corroborative Statement to Filer	No	
Relationship to Reporting Institution(s)	Institution TIN	340797057
	Relationship of Subject	Customer: Yes
Affected Account(s)	Account 1 of 2	
	Account Number	44075100 [REDACTED]
	Financial Institution TIN	340797057
	Account 2 of 2	
	Account Number	44075100 [REDACTED]
	Financial Institution TIN	340797057



FinCEN

Financial Crimes Enforcement Network
United States Department of the Treasury

5 of 12

BSA:31000259112891

BSAR Transcript
BSA: 31000259112891 and DCN:

Suspicious Activity Information	
Amount Involved	\$211,431
Date or Date Range of Activity	08/02/2023 - 11/02/2023
Money laundering	Suspicious EFT/wire transfers Suspicious concerning the source of funds Transaction out of pattern for customer(s)
Structuring	Alters or cancels transaction to avoid CTR requirement Transaction(s) below CTR threshold
Other suspicious activities	Transaction with no apparent economic, business, or lawful purpose
Financial instrument or payment mechanism	Other Financial instrument or payment mechanism: EFT/ Wire U.S. Currency
Financial product	Deposit account

Activity Location		
Financial Institution Location 1 of 1		
Type of Financial Institution	Depository institution	
Primary Regulator	OCC	
Legal Name	KEYBANK NA	
EIN	340797057	
Role in Transaction	Selling/Paying Location	
Address	Address Type	Address where transaction occurred
	Street Address	127 PUBLIC SQUARE
		127 PUBLIC SQ - Enhanced
	City	CLEVELAND
		CLEVELAND - Enhanced
	State	OH
		OH - Enhanced
	ZIP Code	44114-1226
		44114-1217 - Enhanced
	Country	US
		US - Enhanced
Internal Control File Number	CA3255423	
Branch Office Location 1 of 1		
Financial Institution Name	KEYBANK NA	
RSSD Number	0939173	
Address	Address Type	Address where transaction occurred
	Street Address	207 NORTH UNIVERSITY AVE
		207 N UNIVERSITY AVE - Enhanced
	City	PROVO



FinCEN

 6 of 12
 Financial Crimes Enforcement Network
 United States Department of the Treasury

BSA:31000259112891

BSAR Transcript
BSA: 31000259112891 and DCN:

Activity Location		
		PROVO - Enhanced
	State	UT
		UT - Enhanced
	ZIP Code	84603
		84601-2836 - Enhanced
	Country	US
US - Enhanced		

Filer Information		
Primary Regulator	OCC	
Filer Name	KEYBANK NA	
EIN	340797057	
Address	Address Type	Reporting party address
	Street Address	127 PUBLIC SQUARE
		127 PUBLIC SQ - Enhanced
	City	CLEVELAND
		CLEVELAND - Enhanced
	State	OH
		OH - Enhanced
	ZIP Code	44114-1226
		44114-1217 - Enhanced
	Country	US
		US - Enhanced
Type of Financial Institution	Depository institution	
RSSD Number	280110	
Internal control/file number	CA3255423	
Contact for Assistance	Full Name	AML UNIT
	Phone Number	(216) 813-4709
	Phone Type	Work

Law Enforcement Information
No Law Enforcement Information Available

Narrative
KeyBank Case Number: CA3255423
Case Name: BRIDGER L JENSEN



FinCEN

Financial Crimes Enforcement Network
United States Department of the Treasury

7 of 12

BSA:31000259112891

BSAR Transcript
BSA: 31000259112891 and DCN:**Narrative**

NTP-Drugs

INTRODUCTION:

This case was initiated upon receipt of an internal referral from KeyBank branch personnel regarding conducting cash withdrawals in a manner indicative of purposefully evading reporting requirements. The activity involves KeyBank Account 44075100 [REDACTED] in the name of BRIDGER L JENSEN and PSYCHE HEALING AND BRIDGING, LLC. There were no prior investigations identified.

This investigation, which covers the time period of 07/14/2023 (opening) through 11/14/2023, disclosed suspicious account activity involving inbound wires from various individuals/ entity from unknown sources and merchant credits. Additional suspicious account activity involves cash withdrawals as they have no clear economic purpose for the business type. Additionally, some approach just under the reporting threshold. Branch personnel revealed the client intentionally limits cash withdrawals to evade reporting. Furthermore, our customer was identified operating a magic mushroom therapy practice. Therefore, deposits associated as business proceeds could be proceeds from the illicit sale of psilocybin, a schedule I controlled substance and under Utah law. The suspicious activity totals \$211,430.66 in accounts 44075100 [REDACTED] and 44075100 [REDACTED] which occurred between 08/02/2023 through 11/02/2023 at KeyBank branch UT075. SAR warranted.

DETAILS OF INVESTIGATION:

According to bank records BRIDGER L JENSEN, 42 is the Controlling Party of PSYCHE BRIDGING AND HEALING and SINGULARISM. The customer is listed as the 50% Beneficial Owner of PSYCHE BRIDGING AND HEALING. External research revealed he is a life coach/therapist associated with UTAH PSYCHEDELIC THERAPY, MENTAL GURUS, REVEAL MYSELF, PSYCHEDELICCON and UTAH MUSHROOM THERAPY. These entities appear to provide therapy services specializing in clinical psychedelic integration. The customer holds a BS in Therapeutic Recreation/ Psychology from BRIGHAM YOUNG UNIVERSITY and Master of Psychological Counseling from UNIVERSITY OF PHOENIX. The customer has been a KeyBank customer since 07/14/2023 and is listed as residing in Orem, UT. According to bank records and external research PSYCHE BRIDGING AND HEALING appears to be a therapeutic practice in Provo, UT and has been a KeyBank customer since 07/14/2023. According to



FinCEN

Financial Crimes Enforcement Network
United States Department of the Treasury

8 of 12

BSA:31000259112891

BSAR Transcript
BSA: 31000259112891 and DCN:**Narrative**

bank records and external research SINGULARISM appears to a nonprofit group which held its ribbon cutting ceremony on Sept. 6th, 2023. The business appears to be a clinically informed spiritual wellness center plans to begin sessions Oct 1st, 2023. They have been a KeyBank customer since 08/01/2023. They are a grassroots team empowering the legal use of psychedelics for clinical and clergy leadership. The company advertises use of magic mushrooms (psilocybin) for therapeutic services. According to news articles in November 2023, psilocybin is a Schedule I controlled substance and under Utah law, it is illegal to possess or distribute. A recent effort to legalize psilocybin was not approved by the legislature, therefore use and distribution continue to be criminal offenses. JENSEN says they're protected by the Religious Freedom Restoration Act of the U.S. Constitution. The clinic claims they has taken every effort to accord with state and federal constitutional and statutory religious freedom authorities which would permit its religious practices. SINGULARISM is prepared to defend its religious freedom to, as a small religious minority group, partake of its religious rites and sacraments in a closed, supervised, and secure setting. Based upon research conducted by the Utah County Attorney's office, it does not appear that SINGULARISM has constitutional protections to either use of administer psilocybin. City of Provo Police Department released a statement regarding the business and how the mushroom treatment center is allowed to operate legally, and a spokesperson issued the following statement: Psilocybin is a Schedule I controlled substance and under Utah law, it is illegal to possess or distribute. A recent effort to legalize psilocybin was not approved by the legislature, therefore use and distribution continue to be criminal offenses. We have evaluated recent claims that use is protected under the Religious Freedom Restoration Act, and we believe those claims to be without merit. The position of the Provo Police Department is that officers will treat psilocybin as an illegal drug and will arrest or cite users and distributors and refer charges to the Utah County Attorney's Office. We have confirmed with that office that they intend to prosecute violators. A review of public records through Lexis Nexis, World-Check did not reveal any apparent adverse information.

The focus of the investigation consists of the following account(s):

Business Checking account 44075100 [REDACTED] was opened on 07/14/2023. The account is titled BRIDGER L JENSEN and PSYCHE HEALING AND BRIDGING, LLC. This account was reviewed from 07/14/2023 (opening) through 11/14/2023. Credit activity during this review is made up of various retail return credits from entities such as AMAZON, IKEA, LOWS, and HOME GOODS. A \$4,900 cash deposit is also noted on 08/01/2023. Funding is primarily made up of four wire deposits totaling \$125,000 from ASPIRE



FinCEN

Financial Crimes Enforcement Network
United States Department of the Treasury

9 of 12

BSA:31000259112891

BSAR Transcript
BSA: 31000259112891 and DCN:**Narrative**

HEALTH MANAGEMENT LLC, a healthcare support business. Further wires are noted from SKYLER JED ROBERTSON and JERAMY & BECKY LUND. External research suggest SKYLER JED ROBERTSON is a mental health supporter and JERAMY LUND appears to be a business start-up investor. One wire from ASPIRE HEALTH MANAGEMENT LLC has the memo (ASPIRE BUY IN). The wires appear to be business start up investments from related health/ investment counterparties. Although it appears the purpose is for the startup of the business, there is suspicion concerning the source of funds. Additionally, the nature of the business involves illegal controlled substances. As such, all wire deposits are suspicious. Debits are made up of payments with entities such as ADOBE, AMAZON, AMERICA FIRST CREDIT UNION, ASPIRE HEALTH, EMPYREAN ADVISORS (healthcare consultants), FABIAN VANCOTT (law firm), INTUIT, GOOGLE, IKEA, METAPAY, ONTRAPORT (marketing/ sales), WAL-MART, COSTCO, ROSS STORES, RC WILLEY (furniture), U-HAUL, XFINITY, RIVERS STUDIO (design and staging) and ZOOM. One wire is noted on 08/23/2023 to KAILEY STOCCO with memo interior design. Cash withdrawals are made up 14 transactions between 08/08/2023 through 10/31/2023 ranging from \$200 to \$5,900 totaling \$37,260. Branch contact with personnel at UT075 revealed the client is aware of the cash reporting requirements and intentionally limits cash withdrawals to evade reporting. Staff believed the business operated as a psychic service and a church. The branch found the customer unusual as he clearly articulated that he does not want the government to find out about his cash withdrawals and learned to keep cash under \$10,000 from his father. The employee stated the customer is always in a hurry and only wants to conduct transactions with her. She stated she gets anxiety when he is in the branch because he is always rushing her. She finds overall cash withdrawals odd for the business type and does not know the purpose of the cash debits. The customer was in the branch yesterday wanting to open a new business account however, decided against it since he knew he would exceed \$10,000 in one day. Review of cash debits revealed two cash withdrawals on 08/08/2023: \$4,000 and \$5,900 totaling \$9,900. The debits total just below the threshold. Overall cash withdrawals are conducted for unknown purposes as they do not appear consistent with therapy services. Coupled with the client's knowledge and apparent attempt to evade reporting, all are deemed suspicious. Suspicious activity identified.

Business Checking account 44075100 [REDACTED] was opened on 08/01/2023. The account is titled SINGULARISM and BRIDGER L JENSEN. This account was reviewed from 08/01/2023(opening) through 11/14/2023. Credits are made up of a \$100 cash deposit on 08/01/2023 and direct deposits from INTUIT and STRIPE totaling \$46,880.66. These deposits could be proceeds from the illicit sale of psilocybin, a schedule I controlled substance and under Utah law. As such, all direct deposits are deemed suspicious.



FinCEN

Financial Crimes Enforcement Network
United States Department of the Treasury

BSAR Transcript
BSA: 31000259112891 and DCN:

BSA:31000259112891

Narrative

Debits are made up of two cash withdrawals between 09/12/2023 and 10/03/2023 ranging from \$100 to \$2,190 totaling \$2,290. Additional debits include payments with entities such as AMAZON, GUSTO, INTUIT, WAL-MART, UTAH INTERACTIVE LLC (website design), and SUMMIT HEALTH, UTAH CORPORATIONS, transfers to 440751006113 and a \$5,000 Official Bank Check (OBC) purchase on 10/17/2023 made payable to CASSIE MEDURA, who appears to be a family lawyer. Suspicious activity includes cash withdrawals as the true purpose of those debits are unknown and not consistent with business type. Suspicious activity identified.

A sampling of the suspicious activity is detailed below:

Account #440751006113

Date	Amount	Description
8/2/2023	\$25,000.00	WIRE DEP-SKYLER JED ROBERTSON
8/8/2023	\$4,000.00	WITHDRAWAL BRANCH 0075 UTAH
8/8/2023	\$5,900.00	WITHDRAWAL BRANCH 0075 UTAH
9/12/2023	\$5,900.00	WITHDRAWAL BRANCH 0075 UTAH
10/17/2023	\$3,560.00	WITHDRAWAL BRANCH 0075 UTAH
10/19/2023	\$50,000.00	WIRE DEP-JERAMY & BECKY LUND

Account #440751006121

Date	Amount	Description
9/20/2023	\$5.00	DIRECT DEPOSIT, INTUIT 06093985 DEPOSIT
9/20/2023	\$7,179.46	DIRECT DEPOSIT, STRIPE TRANSFER
9/27/2023	\$7,600.00	DIRECT DEPOSIT, INTUIT 10826475 DEPOSIT
9/29/2023	\$6,214.10	DIRECT DEPOSIT, STRIPE TRANSFER
10/5/2023	\$6,214.10	DIRECT DEPOSIT, STRIPE TRANSFER

Page 9

The enclosed information was collected and disseminated under provisions of the Bank Secrecy Act (the BSA) and U.S. Department of the Treasury regulations implementing the BSA. See 31 U.S.C. 5311, et seq., 31 CFR Chapter X. The information is sensitive in nature and is to be treated accordingly. The information may be used only for a purpose consistent with a criminal, tax, or regulatory investigation or proceeding, or in the conduct of intelligence or counterintelligence activities, including analysis, to protect against international terrorism. See 31 U.S.C. 5311. The information cannot be further released, disseminated, disclosed, or transmitted without prior approval of the Director of Financial Crimes Enforcement Network or his authorized delegate. Suspicious activity reports filed under the BSA must be treated with particular care given that they contain unsubstantiated allegations of possible criminal activity, akin to confidential informant tips. Unauthorized release of information collected under the BSA may result in criminal or civil sanctions.



FinCEN

Financial Crimes Enforcement Network
United States Department of the Treasury

BSAR Transcript
BSA: 31000259112891 and DCN:

BSA:31000259112891

Narrative

10/13/2023 \$4,800.00 DIRECT DEPOSIT, INTUIT 28567785 DEPOSIT
 10/17/2023 \$4,800.00 DIRECT DEPOSIT, INTUIT 48157215 DEPOSIT
 10/18/2023 \$6,400.00 DIRECT DEPOSIT, INTUIT 49653875 DEPOSIT
 11/2/2023 \$3,668.00 DIRECT DEPOSIT, INTUIT 22649635 DEPOSIT

The suspicious activity totals \$211,430.66 in accounts 44075100 [REDACTED] and 44075100 [REDACTED] which occurred between 08/02/2023 through 11/02/2023 at KeyBank branch UT075.

CONCLUSION:

This case was initiated upon receipt of an internal referral from KeyBank branch personnel regarding conducting cash withdrawals in a manner indicative of purposefully evading reporting requirements. The activity involves KeyBank Account 44075100 [REDACTED] in the name of BRIDGER L JENSEN and PSYCHE HEALING AND BRIDGING, LLC. There were no prior investigations identified.

This investigation, which covers the time period of 07/14/2023 (opening) through 11/14/2023, disclosed suspicious account activity involving inbound wires from various individuals/ entity from unknown sources and merchant credits. Additional suspicious account activity involves cash withdrawals as they have no clear economic purpose for the business type. Additionally, some approach just under the reporting threshold. Branch personnel revealed the client intentionally limits cash withdrawals to evade reporting. Furthermore, our customer was identified operating a magic mushroom therapy practice. Therefore, deposits associated as business proceeds could be proceeds from the illicit sale of psilocybin, a schedule I controlled substance and under Utah law. The suspicious activity totals \$211,430.66 in accounts 44075100 [REDACTED] and 44075100 [REDACTED] which occurred between 08/02/2023 through 11/02/2023 at KeyBank branch UT075. SAR warranted.

Contents of File:

Customer and Account Profiles

Checks, deposited items and account statements



FinCEN

Financial Crimes Enforcement Network
United States Department of the Treasury

BSAR Transcript

BSA: 31000259112891 and DCN:

BSA: 31000259112891

Narrative

Cash and Wire Reports

Internet Research

Analytical Spreadsheet